

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Khara Inc. et al

Plaintiff,

v.

The Partnerships and Unincorporated  
Associations Identified on Schedule A

Defendants.

Case No. 1:23-cv-02880

Honorable Sharon Johnson Coleman

**MOTION FOR EXTENSION OF TIME**

Defendant xuanenxianliupengdianzishangwuyouxiangongsi by and through its undersigned counsel, respectfully requests an extension of time to respond to Plaintiff's Complaint. In support, Defendant states as follows:

1. Plaintiff filed the Complaint on May 8, 2023.
2. Based on the ostensible service date of the Summons, the original due date for Defendants to answer or otherwise respond to the Complaint was **June 14, 2023**.
3. The undersigned attorney was recently retained by the Defendant which is based outside US.
4. Defendant has been in settlement discussions with Plaintiff but would need additional time to explore settlement and respond to Plaintiff's Complaint.
5. This Court may, for good cause, extend the time by which a Defendant's responses are due. Good cause exists in this case.
6. Defendant respectfully requests this Court extend the date for the Defendant to file answer and/or other response(s) to Plaintiff's Complaint, if ultimately necessary, to **July 5, 2023**.

7. No previous request for extension of time was made.
8. Plaintiff has consented to Defendant's above extension request.

WHEREFORE, Defendants respectfully pray that this Court enter an order extending Defendants' due date to answer and otherwise respond to Plaintiff's Complaint to **July 5, 2023**.

Dated: June 20, 2023

By: /s/ Yong Chen  
Yong Chen  
Attorney for Defendants  
One Penn Plaza, Ste 2508  
New York, NY 10119  
212.547.6694  
Email: [ychen@ambizlaw.com](mailto:ychen@ambizlaw.com)

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing **Motion for Extension of Time** was served upon on all counsel of record electronically through CM/ECF on June 20, 2023.

/s/ Yong Chen